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July 30, 2025

VIA ECF

Hon. Arun Subramanian, U.S.D.J.
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, New York, NY 10007

Re: *SEC v. Unicoïn, et al.*, No. 1:25-cv-4245 (AS) (S.D.N.Y.)
Consent Motion for Adjournment of

Dear Judge Subramanian:

We represent Defendants Unicoïn, Inc., Alexander Konanykhin, Maria Silvina Moschini, and Aljandro Dominguez (collectively, “Defendants”) in this matter. Pursuant to the Court’s Individual Rule of Practice 3.E, Defendants submit this letter-motion to adjourn the initial pre-trial telephonic conference set for August 20, 2025, until September 8 through 10 or September 15 through 19, 2025. This is Defendants’ first request for an adjournment of this conference. Plaintiff Securities and Exchange Commission (SEC) consents to the requested adjournment.

Defendants request this adjournment so that the initial pretrial conference will take place after Defendants file their motion to dismiss the Complaint, which is due on August 27, 2025. (See Dkt. No. 25.) Counsel for both parties have met and conferred, and agree that the parties will be able to more effectively and efficiently prepare for the Court a proposed Civil Case Management Plan and Scheduling Order in advance of the initial pretrial conference if the parties can confer regarding those items after Defendants have filed their motion to dismiss.

The initial pretrial conference is hereby rescheduled to September 9, 2025, at 2:30 PM. The dial-in information remains the same. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 26.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.
Date: July 30, 2025

Respectfully submitted,

/s/ Michael B. Homer

Michael B. Homer (Lead Trial Counsel)

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CC: All counsel of record (via ECF)

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